

DECLARATION OF FLORENCE WEINBERG

I, Florence Weinberg, make the following declaration based on my personal knowledge and declare under the penalty of perjury under the laws of the United States of America, and pursuant to 28 U.S.C. § 1746, that the following is true and correct to the best of my knowledge:

1. I am a practicing attorney licensed to practice before the State of California. My business address is Av. Mexico 188 Colonia del Carmen, Coyoacan, Mexico City, Mexico, 04100. I have been employed as an immigration attorney at the Institute for Women in Migration (IMUMI) since April 2025. I am over the age of 18 and am competent to testify regarding the matters described below.
2. I represent A.H.D., who is a trans woman from Honduras. I make this declaration based on my experience representing her, including information she has conveyed to me in conversations.
3. In June 2007, an immigration judge in Dallas, Texas granted A.H.D. withholding of removal from Honduras, finding that it was more likely than not that she would be persecuted in Honduras on account of her identity and sexual orientation. The Department of Homeland Security did not appeal the immigration judge's decision.
4. In mid-October 2025, police gave A.H.D. a ticket for drinking in a public park with a friend. Police held A.H.D. until ICE came and arrested her.
5. Between mid-October and November 22, 2025, ICE held A.H.D in custody and transferred her to at least two different detention facilities, one in Louisiana and one in El Paso, Texas.
6. On November 22, 2025, ICE deported A.H.D., who had lived in the United States for over 30 years, to Mexico. On that day, immigration agents forced A.H.D. and others to board a bus. At no point was she told or advised in any way that she was getting deported to Mexico. Thus, she never had a chance to express to ICE that she was afraid to go to Mexico because she did not know she was going to Mexico until she got off the bus and saw Mexican immigration officers. She never received anything in writing informing her that she was getting removed to Mexico.
7. She is afraid to be in Mexico because she has no network here, she is living in a shelter, and she is transgender. Mexico is one of the most dangerous countries in the world to be transgender. Transfemicide, the killing of trans women, has been called a silent epidemic by researchers, and given the that the impunity rate for violent crimes in Mexico is approximately 95%, A.H.D. fears for her life and safety.

Executed this 5th day of December, 2025 in Oaxaca de Juarez, Oaxaca, Mexico.



Florence Weinberg